

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

**AUSTIN WORKS, MICHAEL LYNCH,
CARLTON GRIGSBY, MACK GORDON,
CHAD HOLCOMB, CHARLES TILLMAN,
SOLOMON WILLIAMS, JAY STEVEN SMITH,
TIMOTHY RANDELS, FREDDIE OLIVEAUX,
JASON ALBRITTON, and SHAGREY JONES**

CIVIL ACTION NO. 21cv3567

JUDGE HICKS

VERSUS

**FLOWERS FOODS, INC. and FLOWERS
BAKING COMPANY OF TYLER, LLC**

**MAGISTRATE JUDGE
WHITEHURST**

**UNOPPOSED/CONSENT MOTION TO WITHDRAW
AS COUNSEL FOR PLAINTIFF, SHAGREY JONES**

NOW COME undersigned counsel, Steven G. Durio, D. Patrick Keating, Randy M. Guidry, Ryan M. Goudelocke, Travis J. Broussard and Thomas M. Hayes, IV, who represent all plaintiffs in the referenced matter, and who respectfully move to withdraw their representation of plaintiff, Shagrey Jones, for the following reasons:

1.

Plaintiffs were authorized by all plaintiffs to reach a settlement with defendants in this matter.

2.

Under the terms of the settlement, ALL plaintiffs must agree to the settlement and sign the necessary documents prior to receiving their individual settlement proceeds.

3.

All plaintiffs, with the exception of only Shagrey Jones, have signed the Settlement Agreement and Release of Claims.

4.

Plaintiffs' counsel, Thomas M. Hayes, IV, met with Jones at Mr. Hayes' office in Monroe, Louisiana, on September 26, 2024 to discuss and explain the settlement documents; Mr. Jones expressed dissatisfaction with the settlement and refused to sign the settlement documents.

5.

At the end of their meeting, Mr. Hayes suggested to Mr. Jones that he think it over and that Mr. Hayes would follow up with Mr. Jones again in a few days.

6.

Despite numerous attempts since September 30, 2024 by Mr. Hayes and Mr. Durio to contact Mr. Jones, Mr. Jones continues to refuse to sign the Settlement Agreement, or to respond to letters, emails and phone calls from counsel.

7.

Mr. Jones has failed substantially to fulfill his obligation to the undersigned counsel and has been given several warnings that the undersigned will be forced to withdraw if Mr. Jones refuses to execute the settlement documents.

8.

Mr. Jones' continued refusal to sign the settlement documents, or to even communicate with his attorneys, has delayed the settlement for the remaining 10 plaintiffs in this matter, who have expressed deep frustration that they will not be able to obtain the settlement funds they agreed to accept.

9.

Counsel for defendants, Flowers Foods, Inc. and Flowers Baking Company of Tyler, LLC, have indicated they desire to proceed with settlement for the remaining plaintiffs and will consent to this Motion for Withdrawal due to Mr. Jones' recalcitrance.

10.

Undersigned counsel are obligated to pursue approval of the settlement for the remaining plaintiffs, but cannot ethically do so until they have withdrawn from the representation of Mr. Jones.

11.

Mr. Jones's last known address is 20 Havilah Drive, Bastrop, Louisiana 71220; telephone number (318) 801-4068; email: shagreyj@gmail.com.

WHEREFORE, the undersigned, Steven G. Durio, D. Patrick Keating, Randy M. Guidry, Ryan M. Goudelocke, Travis J. Broussard, and Thomas M. Hayes, IV, pray that they be allowed withdraw as counsel for plaintiff, Shagrey Jones.

Respectfully submitted,

/s/ Steven G. Durio
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COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing **UNOPPOSED/CONSENT MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF, SHAGREY JONES** was electronically filed with the Clerk of the Court using the CM/ECF system which sent a notice of electronic filing to counsel as indicated by the Court.

Lafayette, Louisiana, this 19th day of November, 2024.

/s/ Steven G. Durio
STEVEN G. DURIO